



U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

January 6, 2022

BY ECF

The Honorable Vernon S. Broderick United States District Judge Southern District of New York 40 Foley Square New York, New York 10007 APPLICATION GRANTED SO ORDERED A SOURCE VERNON S. BRODERICK U.S.D.J. 01/06/2022

Re: United States v. Louis Lluberes et al., 20 Cr. 493 (VSB)

Dear Judge Broderick:

The Government respectfully writes to request a brief adjournment in filing its oppositions to the pretrial motions of defendants Louis Lluberes, Maria Aguilar, and Maria Lopez. (Dkt. Nos. 116, 118-21.) Under the current schedule, the Government's opposition to those three defendants' motions is due on January 7, 2022. (Dkt. No. 109.) Defendant Moises Lluberes's opening pretrial motions are due on January 7, 2022 and an opposition date for the Government has not yet been set. (Dkt. No. 117.)

While the Government is prepared to file its opposition on January 7, given the near filing of Moises Lluberes's opening motions, the Government respectfully requests an approximately ten-day adjournment of its opposition deadline, to January 18, 2022, to allow for a combined opposition to all four defendants' motions. Counsel for defendants Maria Aguilar and Maria Lopez have consented; counsel for defendant Moises Lluberes takes no position; and we have not yet learned the position of counsel for defendant Luis Lluberes.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By:/s/_____

Nicholas W. Chiuchiolo Daniel G. Nessim Assistant United States Attorneys (212) 637-1247 / 2486

cc: all counsel of record (by ECF)